

EXHIBIT 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF
COLUMBIA, STATE OF HAWAI'I; STATE OF
ILLINOIS; OFFICE OF THE GOVERNOR *ex rel.*
Andy Beshear, in his official capacity as Governor
of the COMMONWEALTH OF KENTUCKY;
STATE OF MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE
OF MICHIGAN; STATE OF MINNESOTA;
STATE OF NEVADA; STATE OF NEW
JERSEY; STATE OF NEW MEXICO; STATE OF
NEW YORK; STATE OF NORTH CAROLINA;
STATE OF OREGON; JOSH SHAPIRO, in his
official capacity as Governor of the
COMMONWEALTH OF PENNSYLVANIA;
STATE OF RHODE ISLAND; STATE OF
VERMONT; STATE OF WASHINGTON; STATE
OF WISCONSIN;**

Plaintiffs,

v.

**CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;**

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF BRIAN HALLETT

Pursuant to 28 U.S.C. § 1746, I, Brian Hallett, hereby declare as follows:

1. I am a resident of the State of Hawai'i. I am over the age of 18 and have personal knowledge of all the facts stated herein, including knowledge based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by Hawai'i State Department of Education (HIDOE) as Assistant Superintendent for the Office of Fiscal Services.

3. In that role, I oversee the financial support services of HIDOE, in particular the allocation of grant award funds and processing of payments in alignment with the purposes of the grant award. These services also include maintaining financial systems used for budgeting, accounting, and the drawdown of federal reimbursements for program expenditures.

4. HIDOE partners with AmeriCorps VISTA for a program designed to provide needed resources to nonprofit organizations and public agencies to increase their capacity to lift communities out of poverty. This was accomplished by providing AmeriCorps VISTA Members at various school sites to increase college and career readiness efforts on each campus. At Waipahu High School, AmeriCorps VISTA Members and Summer Associates were used to specifically assist with increasing capacity within the Early College Program, as well as other college/career/STEM efforts on campus.

5. In connection with this partnership between HIDOE and AmeriCorps, full-time AmeriCorps VISTA Members focus on building resources to support awareness of Early College and Career Academy pathways, which also includes all STEM-related fields. The AmeriCorps volunteers have engaged in the creation of informational material, development of communication channels, outreach strategies, and resource development for Early College, Career Academy, and STEM programs within the Waipahu Complex.

6. In addition to those administrative and logistical functions, AmeriCorps committed \$66,950 in Congressionally appropriated federal funds to support this program in the current fiscal year.

7. This program provides substantial benefits to the State of Hawai'i. Through the support of the AmeriCorps VISTA Member program, from 2022-2024, a total of 338 volunteers were recruited by the VISTA Members to assist the program, 797 service hours were provided to low-income schools/communities, and 4,990 individuals were serviced through the AmeriCorps VISTA Members. Services provided included support and coordination of Early College events, college/career readiness presentations and awareness events, participation in career fairs, support with STEM efforts on school campuses, creating marketing materials to promote college/career efforts on school campuses, and creating partnerships with organizations who can provide college/career opportunities for students.

8. Without the administrative and logistical support of AmeriCorps, and the investment of the federal funds in this program, these benefits will be lost.

9. On April 25, 2025, HIDOE received a notification via email announcing the termination of the AmeriCorps grants pertaining to HIDOE's AmeriCorps programs. The notification was sent by AmeriCorps Award Action on behalf of AmeriCorps. All AmeriCorps funding for the program was affected by the announcement.

10. As of the date of this declaration, for the current fiscal year ending June 30, HIDOE had yet to draw down \$53,010.74 in federal funds.

11. The steps taken to dismantle AmeriCorps and cancel its grants will effectively terminate the HIDOE programs described above.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on May 5, 2025, at Honolulu, HI.



Brian Hallett